

**United States GPS Industry Council  
Suite 600  
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June 18, 2008

U.S. Department of Commerce  
Office of Space Commercialization  
6818 Herbert C. Hoover Building  
14<sup>th</sup> Street & Pennsylvania Avenue, N.W.  
Washington, D.C. 20230  
Attention: Mr. Jason Kim

Re: Docket No.: 080506632-8633-01  
Subj: Codeless and Semi-Codeless Access to the Global Positioning System

Dear Mr. Kim,

Our members can support the target date of December 31, 2020, to transition the installed user base of codeless and semi-codeless GPS equipment to using modernized civil GPS signals since the National Executive Committee for space-based Positioning, Navigation, and Timing has based this date on the launch schedule for the GPS program to provide sufficient on-orbit L2C (and L5) signal capability in order to make this transition feasible.

The Council developed a consensus position on aspects of this transition among our commercial and consumer user equipment manufacturers that was submitted to the Co-Chairs of the National Positioning, Navigation, and Timing (PNT) Engineering Forum (NPEF) and NPEF members. In addition, the Council conducted an outreach effort to external companies to seek their review and comment which was incorporated into our final paper before submission to the NPEF. Individual members provided separate comments in a preliminary interview with representatives of the Office of Space Commerce on the topic of transition.

As you know, it is the millions of existing users who continue to drive GPS innovation to increase their own economic growth and competitiveness in dual-frequency GPS commercial applications. For almost two decades, these users have refined their economic forecasts and product investment strategies based upon their utility of high precision GPS. The upgrade of on-orbit GPS satellite with modernized capability is about a decade long process. The proposed target

transition date of 2020 provides a transition period of about 12 plus years to allow the installed user base to upgrade their existing equipment, systems, and networks using semi-codeless/codeless techniques to modernized civilian GPS signals and realize their predicted return on investment.

We wish to express our appreciation to the National PNT Executive Committee for allowing us the opportunity to provide these comments under the Notice and request for comments.

Considering the complexity of the GPS system and the broad diversity of the installed user base, we fully recognize that it takes a tremendous effort to ensure that nothing happens during transition. On behalf of our members and our GPS customers, we wish to express our strong gratitude.

Sincerely,

F. Michael Swiek  
Executive Director